

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

UNITED STATES OF AMERICA	)	CR. NO.: <u>8:22-846</u>
	)	18 U.S.C. § 1349
	)	18 U.S.C. § 1341
vs.	)	18 U.S.C. § 981(a)(1)(C)
	)	28 U.S.C. § 2461(c)
	)	
WATSON MCBRIDE, III	)	
BRITTANY PHILYAW	)	INDICTMENT

COUNT 1  
(Conspiracy)

THE GRAND JURY CHARGES:

BACKGROUND

1. At all times material to this Indictment, the Defendant, WATSON MCBRIDE, III, was employed with the United States Postal Service as the Postmaster of the United States Post Offices located in Sandy Springs, South Carolina and LaFrance, South Carolina.

2. At all times material to this Indictment, the Defendant, BRITTANY PHILYAW, was employed with the United States Postal Service as a Sales, Service, and Distribution Associate at the United States Post Office located in Sandy Springs, South Carolina.

OBJECT OF THE CONSPIRACY

3. Beginning in or about September 2017 and continuing thereafter through August 2022, in the District of South Carolina and elsewhere, the Defendants, WATSON MCBRIDE, III and BRITTANY PHILYAW, did knowingly and willfully combine,

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conspire, agree, and have tacit understanding with each other to devise and execute a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and during such period, in the course of executing said scheme and artifice did knowingly deposit and cause to be deposited any matter and thing to be sent and delivered by United States Mail and private and commercial interstate carrier, for the purpose of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the Defendants, WATSON MCBRIDE, III and BRITTANY PHILYAW, in the District of South Carolina:

a. made, and caused to be made, materially false statements in certain Cleaning Services Payment Authorization Forms, Cleaning Agreements, and other documents (collectively referred to as “Cleaning Contracts”) concerning the contracts for the cleaning of the United States Post Offices in Sandy Springs and LaFrance, South Carolina, to the United States Postal Service;

b. submitted, and caused to be submitted, to the United States Postal Service certain Cleaning Contracts in which it was falsely and fraudulently represented that individuals other than WATSON MCBRIDE, III and BRITTANY PHILYAW would perform and receive payment for the cleaning of the United States Post Offices in Sandy Springs and LaFrance, South Carolina.

c. caused checks payable to the individuals identified in the Cleaning Contracts for the payment of the cleaning services for United States Post Offices in

Sandy Springs and LaFrance, South Carolina, to be delivered by the United States Mail or private interstate carrier to certain post office boxes in Sandy Springs, South Carolina.

d. cashed checks from the United States Postal Service payable to individuals identified in the Cleaning Contracts; and

e. retained the cash received from the checks payable to the individuals identified in the Cleaning Contracts for themselves.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2 - 5  
(Mail Fraud)

THE GRAND JURY FURTHER CHARGES:

5. The allegations contained in paragraphs 1 through 4 of Count One of this Indictment are incorporated herein.

6. On or about the dates set forth below, in the District of South Carolina and elsewhere, WATSON MCBRIDE, III and BRITTANY PHILYAW, for the purpose of executing the above-described scheme and artifice to defraud, did knowingly cause to be delivered by United States Mail and private or commercial interstate carrier the following envelopes containing checks as payment for the services described in the Cleaning Contracts:

<u>COUNT</u>	<u>DATE</u>	<u>ADDRESS</u>	<u>CHECK</u>
2	June 27, 2022	S.M. Post Office Box 101 Sandy Springs, SC 29677-0101	Check No. 280752338 in the amount of \$200.00
3	June 27, 2022	G.M. Post Office Box 9998 Sandy Springs, SC 29677-9998	Check No. 280751620 in the amount of \$70.00.
4	June 13, 2022	S.M. Post Office Box 101 Sandy Springs, SC 29677-0101	Check No. 280741139 in the amount of \$200.00
5	June 13, 2022	G.M. Post Office Box 9998 Sandy Springs, SC 29677-9998	Check No. 280740275 in the amount of \$70.00

In violation of Title 18, United States Code, Section 1341.

FORFEITURE

MAIL FRAUD/CONSPIRACY:

Upon conviction to violate Title 18, United States Code, Sections 1341 and 1349 as charged in this Indictment, the Defendants, WATSON MCBRIDE, III and BRITTANY PHILYAW, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendants obtained directly or indirectly as a result of such violations.

PROPERTY:

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained directly or indirectly as the result of the offenses charged in this Indictment, that is, a minimum of \$33,188.00 and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to their violations of Title 18.

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendants:

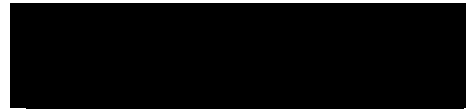
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A True Bill



FOREPERSON

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

By: Winston Marosek  
Winston I. Marosek (Fed. ID 13189)  
Assistant United States Attorney  
55 Beattie Place, Suite 700  
Greenville, South Carolina 29601  
Tel: 864-282-2100  
Fax: 864-233-3158  
Email: Winston.Marosek@usdoj.gov